

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Robertson, Anschutz, Schneid, Crane &amp; Partners, PLLC</b> 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor  Kimberly Wilson, Esq. (031441997)	CASE NO.: 23-16337-JNP CHAPTER 13  <b>Objection to Confirmation of Debtor's Chapter 13 Plan</b>
<b>In Re:</b>  <b>Garfield A Mckenzie,</b>  <b>Debtor.</b>	

**OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

U.S. Bank Trust Company, National Association, as Trustee, as successor-in-interest to U.S. Bank National Association, as trustee, in trust for registered holders of First Franklin Mortgage Loan Trust, Mortgage Loan Asset-Backed Certificates, Series 2007-FF1 ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 12), and states as follows:

1. Garfield A Mckenzie ("Debtor") filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on July 25, 2023.
2. Secured Creditor holds a security interest in the Debtor's real property located at 241 Independence Blvd Lawnside, NJ 08045, by virtue of a Mortgage recorded on December 12, 2006 in Book 08409, at Page 1270 of the Public Records of Camden County, NJ. Said Mortgage secures a Note in the amount of \$198,000.00.
3. The Debtor filed a Chapter 13 Plan on August 14, 2023.
4. The Plan does not provide for Secured Creditor's claim.
5. Based upon the foregoing, Secured Creditor objects to confirmation of the Plan pursuant to 11 U.S.C. 1325(a)(1) & 1325(a)(5) on the grounds that the Plan does not provide for its secured claim.

**WHEREFORE**, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

Robertson, Anschutz, Schneid, Crane & Partners,  
PLLC  
Authorized Agent for Secured Creditor  
130 Clinton Road, Suite 202, Lobby B  
Fairfield, NJ 07004  
Telephone: 973-575-0707  
Fax: 973-404-8886

By: /s/Kimberly Wilson  
Kimberly Wilson, Esquire  
NJ Bar Number 031441997  
Email: kimwilson@raslg.com

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Robertson, Anschutz, Schneid, Crane &amp; Partners, PLLC</b> 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 973-575-0707 Attorneys For Secured Creditor  Kimberly Wilson, Esq. (031441997)	CASE NO.: 23-16337-JNP CHAPTER 13  <b>Objection to Confirmation of Debtor's Chapter 13 Plan</b>
<b>In Re:</b>  <b>Garfield A Mckenzie,</b>  <b>Debtor.</b>	

**CERTIFICATION OF SERVICE**

1. I, Maria Jaramillo, am the secretary/paralegal for Robertson, Anschutz, Schneid, Crane & Partners, PLLC, who represents U.S. Bank Trust Company, National Association, as Trustee, as successor-in-interest to U.S. Bank National Association, as trustee, in trust for registered holders of First Franklin Mortgage Loan Trust, Mortgage Loan Asset-Backed Certificates, Series 2007-FF1 in the above-captioned matter.
2. On August 31, 2023, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below:  
  
**OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date : 8/31/2023

Robertson, Anschutz, Schneid, Crane & Partners,  
PLLC  
Authorized Agent for Secured Creditor  
130 Clinton Road, Suite 202, Lobby B  
Fairfield, NJ 07004  
Telephone: 973-575-0707  
Fax: 973-404-8886  
By: /s/ Maria Jaramillo

Email: [mjaramillo@raslg.com](mailto:mjaramillo@raslg.com)

<b><u>Name and Address of Party Served</u></b>	<b><u>Relationship of Party to the Case</u></b>	<b><u>Mode of Service</u></b>
Georgette Miller Dilworth Paxson LLP 1500 Market Street Suite 3500e Phildelphia, PA 19102	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*) _____
Garfield A Mckenzie 241 Independence Blvd Lawnside, NJ 08045	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*) _____
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*) _____
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other  (as authorized by the court*) _____